

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AARON KATZEL,

Plaintiff,

-against-

**Case No. 20-cv-07220 (AKH)**

AMERICAN INTERNATIONAL GROUP, INC.,

DECLARATION

Defendant.

-----X

STATE OF NEW YORK     )  
                                      )     ss.:  
COUNTY OF NEW YORK    )

Neal Brickman, an attorney duly admitted to practice in this State and before this Court, hereby states and avers under penalties of perjury that:

1. I am an attorney at The Law Offices of Neal Brickman, P.C., counsel for Plaintiff in the above-caption action, and, as such, I am fully aware of the facts and circumstances of this matter. The bases of my knowledge are documents in our possession and discussions with Plaintiff.

2. I submit this Declaration in opposition to Defendant's Motion for Summary Judgment.

3. Specifically, I submit this Declaration to place before the Court certain materials and information relevant to the Court's consideration of Defendants' Motion for Summary Judgment. We submit that these materials, together with Mr. Katzel's Declaration ("Katzel Decl."), Plaintiff's Response to Defendant's Local Civil Rule 56.1 Statement of Undisputed Material Facts and Plaintiff's Counter Statement of Undisputed Material Facts ("CSOF"), and

Plaintiff's Memorandum of Law in Opposition to Summary Judgment warrant this Court's denial of Defendants' motion.

4. Attached hereto as Exhibit "1" are true copies of Limited Employment records maintained by Defendant AIG's concerning Plaintiff's his tenure at AIG. (Bates AIG-5602-5).

5. Attached hereto as Exhibit "2" are true copies of Plaintiff's job performance reviews given by his respective supervisors from 2010 through 2016-year end. (Bates R-0019014-0019128).

6. Attached hereto as Exhibit "3" is a true copy of excerpts of the AIG Global Claims Operations Playbook which includes an overview of the tasks and objectives handled by the Legal Operations Center led by Plaintiff while at AIG. (Bates AIG-0001142, 1147, 1168).

7. Attached hereto as Exhibit "4" is a true copy of the Legal Operations Company ("LOC") "Investment Considerations" presentation dated April 21, 2016 which was approved for presentation and dissemination to public investors. (Bates AIG-0002773-0002846, at 0002780-2781).

8. Attached hereto as Exhibit "5" is a true copy of excerpts from the deposition transcript of Konstanty Owczarek's taken in the OSHA proceeding on December 20, 2019 as cited within Plaintiff's CSOF. (Pages 38:14-25; 38:15-21; 41:2-8; 49:25-50:8; 94:17-21; 95:18-19; 96:16-97:5; 100:4-101:12; 105:3-18; 107:16-24; 122:14-123:8; 126:13-19; 127:6-11; 143:2-8; 146:15-19; 151:19-153:11; 164:2-19; 175:24-176:15, 187:9-18, 198:12-21; 210:20-211:11; 214:18-21; 216:23-17:6).

9. Attached hereto as Exhibit "6" is a true copy of excerpts from the GCO Optionality Discussion March 2016 (R-4122,4144-5,4147-9,4163-4,4176).

10. Attached hereto as Exhibit “7” is a true copy of the March 16, 2017 LOC Enhancing Value and Service to AIG Business Partners presentation (R-18850-77).

11. Attached hereto as Exhibit “8” is a true copy of the excerpts from the deposition transcript of Charith Perera’s Deposition dated October 5, 2021 as cited within Plaintiff’s CSOF (Pages: 33:2-22; 35:18-36:20; 161:11-162:16).

12. Attached hereto as Exhibit “9” is a true copy of a July 29, 2016 Memorandum from AIG Corporate Development (Konstanty Owczarek, Max Rossiter) to Schimek and Russo presenting the Legal Operations Center Carve-out process for Project “Kalahari” (Bates R-0006718-25).

13. Attached hereto as Exhibit “10” are true copies of excerpts from Oliver Wyman’s Project Kalihari Steering Committee Presentation from April 8, 2015 (Bates OW\_00300-02).

14. Attached hereto as Exhibit “11” is a true copy of Oliver Wyman’s Project Kalihari Review of September 2, 2015 (Bates OW-00894-927).

15. Attached hereto as Exhibit “12” are true copies of the excerpts from the deposition transcript of Aaron Katzel’s OSHA Deposition dated October 25, 2019 as cited within Plaintiff’s CSOF certain relevant excerpts from (Pages: 22:2-23; 45:25-48:10; 49:21-50:7; 64-67; 84:21-85:10; 86:21-87:15; 148:13-151:22; 149:18-25; 151:3-6; 224:9-228:11; 231:19-232:5; 244:10-245:25; 253:13-254:11; 255:24-257:19; 261:11-263:15; 306:13-307:10; 309:9-310:4).

16. Attached hereto as Exhibit “13” are true copies of the excerpts from the deposition transcript of Sid Sankaran’s Deposition dated October 27, 2021 as cited within Plaintiff’s CSOF certain relevant excerpts from (Pages: 20:13-21:14; 39:16-40:18; 53-55; 127:25-128:8; 138:16-139:5; 177:25-178:2; 178:17-179:24; 193:7-22; 202:24-203:10).

17. Attached hereto as Exhibit “14” are true copies of the excerpts from the exhibits marked at the deposition of Sid Sankaran’s Deposition dated October 27, 2021 as Exhibits 1A and 1B and which exhibits respectively consist of Bates AIG-0001270-1505 and AIG-0001506-1579.

18. Attached hereto as Exhibit “15” are true copies of excerpts from Oliver Wyman’s March 30, 2015 Project Kalihari Market Validation March 30 2015 (Bates OW-266,268-70).

19. Attached hereto as Exhibit “16” are true copies of email correspondence dated August 3, 2011<sup>6</sup> as between Jeffrey Hurd and Sid Sankaran. (Bates - R-0008470-3 and marked at the deposition of Jeffrey Hurd as “Hurd 0020.”)

20. Attached hereto as Exhibit “17” is a true copy of the email and accompanying attachment from AIG Corporate Development (Rossiter) regarding advancements made regarding the Legal Operations Center Carve-out process for Project “Kalahari” (Bates R-0005378-5383, marked as “Neches 0013” at the Deposition of Alon Neches dated October 13, 2021).

21. Attached hereto as Exhibit “18” are true copies of the letter of interest sent from the Loeb Holding Corporation’s President James L. Kempner, dated October 8, 2015 (Bates R-0008419).

22. Attached hereto as Exhibit “19” is a true copy of excerpts from the presentation of the Strategic Transactions Policy and Procedures of Defendant American International Group, Inc. (Bates R-0019161, 0019167-8).

23. Attached hereto as Exhibit “20” is a true copy of the email correspondence dated May 26, 2016 regarding TLOC and Project Kalahari (Bates R-0001692-3, marked as “Neches 0004” at the Deposition of Alon Neches dated October 13, 2021).



24. Attached hereto as Exhibit “21” is a true copy of a May 31, 2016 email exchange between Konstanty Owczarek and Alon Neches regarding the TLOC kick-off meeting (Bates R-0001717-9).

25. Attached hereto as Exhibit “22” are true copies of certain relevant excerpts from Konstanty Owczarek’s Deposition dated November 23, 2021, (p.7:3-25; 8:7-15; 13:7-14:2, 13:14-25; 24:13-25:15; 34:10-38:6; 43:22-44:7; 46:14-48:16, 48:17-22; 57:23-58:3; 95:14-101:4; 104:24-109:20; 119:11-18; 120:21-121:23).

26. Attached hereto as Exhibit “23” is a true copy of an email correspondence exchange and accompanying attachment from October 11, 2016 regarding Project Kalahari between Sankaran, Hurd, and Schimek (Bates AIG-0003542-67, also marked at the deposition of Jefferey Hurd as “Hurd 0026”).

27. Attached hereto as Exhibit “24” is a true copy of an email exchange dated October 24, 2016, between Owczarek, Frank Li, and Rossiter celebrating the termination of Project Kalihari (Bates R-0005914).

28. Attached hereto as Exhibit “25” are true copies of email correspondence dated October 24, 2016 wherein Katzel thanks the Claims and GLCR business partners for pursuing “Project Kalahari” fully for the past year and Perera and Tim Gladura express that they are glad Project Kalihari was terminated (Bates R-0006755-7, also marked at the deposition of Charith Perera as “Perera 0024”).

29. Attached hereto as Exhibit “26” are true copies of email correspondence from dated July 8, 2016 from Perera regarding analysis of the LOC. (Bates R-0002140-6 also marked at Perera’s deposition as “Perera 0014”).

30. Attached hereto as Exhibit “27” is a true copy of an email exchange between Alon Neches to Sid Sankaran dated October 10, 2016 regarding TLOC. (Bates R-00017944 also marked as “Neches 0023” at the deposition of Alon Neches).

31. Attached hereto as Exhibit “28” is a true copy of an email exchange dated September 29, 2016 between Owczarek and Frank Li concerning notes from the first claims meeting on TLOC and including initial summaries (Bates R-0004911-7).

32. Attached hereto as Exhibit “29” is a true copy of a October 20, 2016 email from AIG Vice President, Deputy General Counsel and General Counsel, Eric Kobrick to Solmssen that the Corporate Development team would send a note on TLOC (Bates R-0002991)

33. Attached hereto as Exhibit “30” is a true copy of the excerpts from the deposition transcript of Peter Solmssen’s Deposition dated December 7, 2021 as cited within Plaintiff’s CSOF. (pp.15:16-17:25; 22:24-23:7; 39:3-17; 40:12-41:6; 42:9-15; 46:20-47:2; 52:20-25; 63:5-65:11; 67:8-24; 76:5-18; 80:14-18; 90:4-11; 104:10-18; 108:2-8; 110:16-17; 111:11-23; 116:14-20; 126:14-18; 128:10-15; 120:20-121:5; 131:19-132:9; 147:3-22; 148:2-10;).

34. Attached hereto as Exhibit “31” is a true copy of the excerpts from the deposition transcript of Peter Solmssen’s OSHA Deposition dated January 7, 2020 as cited within Plaintiff’s CSOF. (pp. 12:7-23; 21:14-25; 24:22-25:21; 26:13-22; 27:15-20; 28:15-19; 30:14-23; 32-4:14; 36:15-24; 37:19-38:2; 38:15-21; 40:14-17; 42:6-16; 45:25-46:21; 55:23-56:13; 63:3-12; 93:19-21; 97:17-23; 105:16-106:5; 107:10-15; 129:8-130:3; 137:9-13; 141:4-6; p.145:23-146:13; 152:8-153:2; 154:5-22; 131:22-133:2);

35. Attached hereto as Exhibit “32” is a true copy of the excerpts from the deposition transcript of Alon Neches’ Deposition dated October 13, 2021 as cited within Plaintiff’s CSOF. (pp. 53:7-12; 135:7-138:20; 152:19-153:20).

36. Attached hereto as Exhibit “33” are true copies of email correspondence between Owczarek, Katzel and Neches dated October 20, 2016 regarding the survey. (Bates R-0001831, also marked as “Neches 0028” at the deposition of Alon Neches).

37. Attached hereto as Exhibit “34” are true copies of email correspondence from Konstanty Owczarek to Aaron Katzel and Alon Neches dated October 20, 2016 regarding the TLOC. (Bates Respondent\_00015353 also marked as “Neches 0029” at the deposition of Alon Neches).

38. Attached hereto as Exhibit “35” are true copies of email correspondence between Kobrick, Neches, and Owczarek dated October 25, 2016 regarding TLOC. (Bates R-0005007-9 also marked as “Neches 0031” at the deposition of Anon Neches).

39. Attached hereto as Exhibit “36” is a true copy of an excerpt from AIG’s Corporate Development Policy. (Bates R-0019139).

40. Attached hereto as Exhibit “37” is a true copy of an email exchange dated September 17, 2016 between Owczarek and Neches concerning Plaintiff. (Bates R-0000721).

41. Attached hereto as Exhibit “38” is a true copy of an email exchange between Katzel and Solmssen dated March 15, 2017 concerning potential enhancements to the LOC (Bates R-0011067).

42. Attached hereto as Exhibit “39” are true copies of an email correspondence exchange between Owczarek and Kobrick dated October 20, 2016. (Bates R-0000289-91).

43. Attached hereto as Exhibit “40” are true copies of an email correspondence exchange between Owczarek and Katzel dated October 21, 2016. (Bates R-0001792).

44. Attached hereto as Exhibit “41” are true copies of an email correspondence exchange between Owczarek and Katzel dated October 20, 2016 concerning surveys regarding the LOC. (Bates R-0001831).

45. Attached hereto as Exhibit “42” is a true copy of excerpts from AIG’s Code of Conduct (Bates AIG-4873,4875,4885-4896).

46. Attached hereto as Exhibit “43” is a true copy of AIG’s Global Records and Information Management Policy (Bates AIG-0005528-31).

47. Attached hereto as Exhibit “44” are true copies of AIG’s Corruption Risk Questionnaire which was marked as “Nelson 0014” at the deposition of Karen Nelson conducted on October 12, 2021.

48. Attached hereto as Exhibit “45” are true copies of email correspondence between Katzel and McCormack dated December 8, 2016. (Bates R-0014865, also marked as “Nelson 0016” at the deposition of Karen Nelson conducted on October 12, 2021.)

49. Attached hereto as Exhibit “46” is a true copy of an email exchange between Accenture and AIG dated March 7, 2016 concerning the LOC. (Bates R-0003995 also marked as “Perera 0004” at the deposition of Charith Perera conducted on October 5, 2021.)

50. Attached hereto as Exhibit “47” are true copies of an email exchange dated May 2, 2016 between Perera and Jonathan Wicksall of Accenture (Bates R-00002667-2669).

51. Attached hereto as Exhibit “48” are true copies of email correspondence between Katzel and Scott Fields of UBS dated September 13, 2016. (Bates UBS-00000057-9).

52. Attached hereto as Exhibit “49” are true copies of email correspondence between Accenture employees Jochen Rodel and Jonathan Wicksall dated October 22, 2016. (Bates Accenture-0003681-0003684).



53. Attached hereto as Exhibit “50” are true copies of an email correspondence exchange and accompanying attachment as sent between Perera and Kenneth Saldanha on March 8, 2016. (Accenture-00000041-9).

54. Attached hereto as Exhibit “51” are true copies of an email exchange and accompanying attachment between Perera and Owczarek on August 22, 2016. (Bates R-0000998-9, also marked as “Perera 0018” at Perera’s deposition).

55. Attached hereto as Exhibit “52” is a true copy of an appointment calendar invite with the subject Canceled: Kalahari Interviews dated August 24, 2016. (Bates R-0018402, also marked as “Perera 0019” Perera’s deposition).

56. Attached hereto as Exhibit “53” are true copies of excerpts from M. McCormack’s OSHA Deposition dated December 12, 2019 (pp. 36:2-37:8; 44:7-45:7; 45:4-47:11; 75:5-77:10; 79:7-11; 79:17-19; 89:15-22; 92:7-18; 94-96; 99:3-8; 100; 138:11-16; 147:9-11; 167:22-171:10).

57. Attached hereto as Exhibit “54” is a true copy of a February 3, 2017 email exchange with Nelson regarding the AIG Accenture SOW with limited attachments (Bates AIG-0003419-0003425).

58. Attached hereto as Exhibit “55” are true copies of an excerpt of AIG’s Conflicts of Interest Policy. (Bates R-0019136).

59. Attached hereto as Exhibit “56” is a true copy of an email exchange between Perera and Hu dated August 29, 2016 regarding Accenture. (Bates R-000124).

60. Attached hereto as Exhibit “57” is a true copy of an October 10, 2016 email from Katzel to Russo, Neches, Sankaran, and Owczarek concerning the Kalahari UBS opportunity (Bates R-9266-7 also identified as Neches 24 and Neches’ Deposition).

61. Attached hereto as Exhibit “58” is a true copy of the email correspondence dated October 17, 2016 and the accompanying attachment regarding TLOC and Project Kalahari (Bates R-0006029-55, marked as “Neches 0027” at the Deposition of Alon Neches dated October 13, 2021).

62. Attached hereto as Exhibit “59” is a true copy of an email exchange between Owczarek and Neches dated September 7, 2016 regarding TLOC (Bates R-0006192-5).

63. Attached hereto as Exhibit “60” is a true copy of an email correspondence exchange between Katzel and Owczarek dated September 15, 2016 regarding LOC cost elements and asking that it not be shared with Accenture. (Bates R-0000742-5).

64. Attached hereto as Exhibit “61” is a true copy of an email correspondence exchange between Owczarek and Neches dated September 7, 2016 regarding TLOC (Bates R-0001424-5).

65. Attached hereto as Exhibit “62” is a true copy a Fortune.com news article dated July 22, 2022 regarding AIG’s plan to offload 6,000 employees to Accenture.

66. Attached hereto as Exhibit “63” are true copies of email correspondence dated March 10, 2016 between Accenture employees circulating a target operating model for AIG LOC. (Bates Accenture-0000114).

67. Attached hereto as Exhibit “64” are true copies of email correspondence concerning the LOC dated March 3, 2016 between Accenture employees and the accompanying attachment. (Bates Accenture-0000161-86).

68. Attached hereto as Exhibit “65” are true copies of email correspondence dated March 5, 2016 between Accenture employees regarding AIG. (Bates Accenture-0000192-4).

69. Attached hereto as Exhibit “66” are true copies of email correspondence dated September 22, 2016 between Owczarek and Accenture employee Saldanha regarding the LOC. (Bates Accenture-0000075-6).

70. Attached hereto as Exhibit “67” are true copies of an Accenture March 2016 presentation entitled Proposal for Strategic Review of AIG’s Medical and Litigation Management. (Bates Accenture-0000102-9).

71. Attached hereto as Exhibit “68” are true copies of an email correspondence exchange and accompanying attachment between UBS and Accenture employees dated November 6, 2016 regarding Accenture’s proposal to UBS. (Bates Accenture-0000522-542).

72. Attached hereto as Exhibit “69” are true copies of an email correspondence exchange and accompanying attachment sent between Accenture employees on February 24, 2017 regarding Accenture’s Task Order as it related to its proposal to UBS. (Bates Accenture-0003072-89).

73. Attached hereto as Exhibit “70” are true copies of an email correspondence exchange and accompanying attachment sent between Accenture employees on December 15, 2016 regarding Accenture’s proposal to UBS. (Bates Accenture-0002636-46).

74. Attached hereto as Exhibit “71” are true copies of an email correspondence exchange between AIG employees dated October 19, 2016 regarding LOC’s RFP to UBS. (Bates R-0000320-1).

75. Attached hereto as Exhibit “72” are true copies of an email correspondence exchange dated October 19, 2016 between Accenture employees and UBS employees regarding Accenture proposal to UBS. (Bates Accenture-0000746-0000749).

76. Attached hereto as Exhibit “73” are true copies of an email correspondence exchange dated October 4, 2016 and accompanying attachment as sent between Accenture employees and UBS employees regarding Accenture’s proposal to UBS. (Bates Accenture-0001258-69).

77. Attached hereto as Exhibit “74” is a true copy of an excerpt of AIG’s Code of Business Conduct and Ethics. (Bates AIG-0005075.)

78. Attached hereto as Exhibit “75” is a true copy of an email correspondence exchange dated July 8, 2016 regarding AIG’s RFP sent to advisory groups including Accenture. (Bates R-0013390, also marked as “Perera 0012” at the deposition of Charith Perera conducted on October 5, 2021).

79. Attached hereto as Exhibit “76” are true copies of email correspondence among Accenture employees dated March 16, 2016 regarding Accenture evaluating AIG’s LOC Operation Model. (Bates Accenture-0000209-10).

80. Attached hereto as Exhibit “77” are true copies of an email correspondence exchange and accompanying attachment dated September 30, 2016 between Accenture employees regarding Accenture’s AIG Transformation Discussion. (Bates Accenture-0000151-7).

81. Attached hereto as Exhibit “78” are true copies of the Oliver Wyman presentation regarding AIG Legal Operations Center as adapted for Corporate Development. (Bates R-0006023-8).

82. Attached hereto as Exhibit “79” are true copies of the email correspondence from Sankaran to Oliver Wyman concerning its presentation regarding the AIG Legal Operations Center. (Bates R-0007893-5).



83. Attached hereto as Exhibit “80” are true copies of email correspondence between Perera and Hu dated September 7, 2016 regarding Accenture employee being involved with the analysis of the LOC. (Bates R-0000123-4 also marked as “Perera 0022” at Perera’s deposition).

84. Attached hereto as Exhibit “81” are true copies of email correspondence exchange dated December 2, 2016 between McCormack and Horton regarding Aaron Katzel’s response to the 2016 Fraud Risk Assessment Questionnaire. (Bates R-0018883-5, also marked as “Solmssen 0022” Solmssen’s deposition herein).

85. Attached hereto as Exhibit “82” is a true copy of an excerpt from AIG’s Strategic Transactions Policy and Procedure. (Bates R-000532).

86. Attached hereto as Exhibit “83” are true copies of AIG’s Curriculum Training Details demonstrating Code of Conduct training completion. (Bates AIG-0005597-9).

87. Attached hereto as Exhibit “84” are true copies of certain relevant excerpts from Karen Nelson’s Deposition dated October 12, 2021 (pp: 43; 44:10-17; 77:4-5; 81:18-21; 89; 95:7; 97:23-25; 98; 99:17-100:20; 105:2-24; 127:25-128:17; 133:5-134:5; 148:12-16; 149:3-12; 149:10-150:9; 168:7-15; 178:4-180:10; 190:11-20; 196:10-24; 201:5-25; 205:2-5; 206:6-21; 207-209; 208:3-8).

88. Attached hereto as Exhibit “87” is a true copy of AIG’s Global Fraud Reporting Policy (R-19130-4; also marked as Nelson “7” and Nelson’s deposition).

89. Attached hereto as Exhibit “86” is a true copy of Procedure for the Escalation of Compliance Allegations for Investigation (Bates AIG-0005520-2)

90. Attached hereto as Exhibit “87” are true copies of AIG Global Employee Conflict of Interest Policy and AIG Global Fraud Reporting Policy. (Bates R-0019130-8).

91. Attached hereto as Exhibit “88” is a true copy of AIG’s Corporate Investigative Protocols (Bates AIG-0004862-72)

92. Attached hereto as Exhibit “89” is a true copy of AIG’s talking points following the purported Fraud Risk Assessment review of the LOC (Bates R-0015410-1).

93. Attached hereto as Exhibit “90” is a true copy of AIG’s Global Information Handling Standards (Bates R-0019149-52).

94. Attached hereto as Exhibit “91” is a true copy of email correspondence between AIG’s employees Horton and McCormack dated May 4, 2017 and accompanying attachment regarding LOC Review Talking Points. (Bates AIG-0004604-6).

95. Attached hereto as Exhibit “92” is a true copy of AOG’s Audit Committee Charter.

96. Attached hereto as Exhibit “93” is a true copy of email correspondence between AIG employees dated January 30, 2017 regarding whether the disclosure of AIG information to Accenture invoked any AIG policies. (Bates AIG-0002717).

97. Attached hereto as Exhibit “94” is a true copy of email correspondence between Sankaran and Doney Largey and Sid Sankaran dated May 6, 2017 regarding topics for a scheduled meeting. (Bates AIG-0002661).

98. Attached hereto as Exhibit “95” is a true copy of email correspondence from AIG employee Marie McCormack dated February 9, 2017 memorializing a conversation with Nelson who validated Katzel’s concerns regarding the review of Project Kalahari. (Bates R-0011150.)

99. Attached hereto as Exhibit “96” is a true copy of AIG’s Global Employee Conflict of Interest Policy updated as of April 13, 2017. (Bates AIG-0001905-8).

100. Attached hereto as Exhibit “97” is a true copy of email correspondence between AIG and Accenture dated May 31, 2017 regarding the destroying of data. (Bates AIG-10347-8).

101. Attached hereto as Exhibit “98” is a true copy of email correspondence between Solmssen and Rhodri Williams and Victoria Bozovic dated January 17, 2017 regarding his self-assessment. (Bates R-0014482-3).

102. Attached hereto as Exhibit “99” is a true copy of email correspondence between Solmssen and Bozovic dated March 22, 2017 regarding the LOC. (Bates R-0014476-8).

103. Attached hereto as Exhibit “100” is a true copy of email correspondence between Aaron Katzel and Peter Solmssen dated October 27, 2016 pertaining to a meeting regarding the LOC. (Bates R-0006942, also marked as CX Exhibit 65 during prior OSHA proceedings).

104. Attached hereto as Exhibit “101” is a true copy of email correspondence between Aaron Katzel and Peter Solmssen dated November 10, 2016. (Bates R-000888, also marked as CX Exhibit 71 during prior OSHA proceedings).

105. Attached hereto as Exhibit “102” is a true copy of email correspondence between Perera and Hurd dated October 26, 2016. (Bates R-0003543, also marked as CX Exhibit 63 during prior OSHA proceedings and as “Perera 0025” Perera’s deposition).

106. Attached hereto as Exhibit “103” is a true copy Solmssen correspondence to Perera, Jacobs, and Bozovic concerning the LOC review. (Bates R-0013679, also marked as “Perera 0030” at Perera’s deposition).

107. Attached hereto as Exhibit “104” is a true copy is a true copy of email correspondence between Owczarek and AIG team members dated November 11, 2016. (Bates R-0017338, also marked as “Perera 0033” at Perera’s deposition).

108. Attached hereto as Exhibit “105” is a true copy is a true copy of email correspondence between AIG employees dated October 25, 2016 concerning Loc’s future post termination of TLOC. (Bates R-0011158).

109. Attached hereto as Exhibit “106” is a true copy is a true copy of email correspondence between Solmssen and Bozovic regarding the LOC dated November 8, 2016. (Bates R-0003026).

110. Attached hereto as Exhibit “107” is a true copy is a true copy of email correspondence between Perera and Jacobs dated November 30, 2016 concerning LOC surveys. (Bates R-0010979, also marked as “Perera 0035” at Perera’s deposition).

111. Attached hereto as Exhibit “108” is a true copy is a true copy of email correspondence between Solmssen and Hurd dated December 6, 2016. (Bates R-0011066, also marked as CX Exhibit 73 during prior OSHA proceedings).

112. Attached hereto as Exhibit “109” is a true copy is a true copy of email correspondence between Solmssen and Katzel dated February 23, 2017. (Bates R-0010146-8).

113. Attached hereto as Exhibit “110” is a true copy of email correspondence between Katzel and Anette Bernstein dated May 4, 2017. (Bates R-0011057-8).

114. Attached hereto as Exhibit “111” is a true copy is a true copy of email correspondence between Bernstein and Katzel dated May 17, 2017. (Bates R-0011054-6).

115. Attached hereto as Exhibit “112” is a true copy is a true copy of the excerpts from the deposition transcript of Jeffrey Herd taken on October 29, 2021 as cited within Plaintiff’s CSOF. (p. 20)



116. Attached hereto as Exhibit “113” is a true copy of email correspondence between David Lee and Solmssen dated May 4, 2017 containing talking points regarding Aaron Katzel’s termination. (Bates R-0018711-3).

117. Attached hereto as Exhibit “114” is a true copy of email correspondence between Solmssen and Bozovic dated May 3, 2017. (Bates R-0011080).

118. Attached hereto as Exhibit “115” is a true copy of email correspondence between Solmssen and Bozovic dated May 4, 2017 regarding talking points about the LOC and Aaron Katzel’s termination. (Bates R-11099).

119. Attached hereto as Exhibit “116” is a true copy of excerpts from AIG’s 2018 Proxy Statements.

120. Attached hereto as Exhibit “117” is a true copy of Aaron Katzel’s UBS Investment Account statements as of April 2016. (Bates UBS-001073-82).

121. Attached hereto as Exhibit “118” is a true copy of is a true copy of correspondence from The Boyd Law Group, PLLC send on August 6, 2018 to counsel for AIG regarding the elimination of Aaron Katzel’s equity awards. (Bates AIG-0003865-8).

122. Attached here to as Exhibit “119” is a true copy is a true copy of correspondence from The Boyd Law Group, PLLC send on September 10, 2018 to OSHA setting forth a formal complaint on behalf of Aaron Katzel with accompanying exhibits.

123. Attached hereto as Exhibit “120” is a true copy of Aaron Katzel’s UBS Investment Account, Account Summary for several months across 2017. (Bates UBS-001504-5, 14-21).

124. Attached hereto as Exhibit “121” is a true copy of email correspondence between AIG and UBS employees from 2018 to 2020 regarding blocking Katzel’s access to his UBS

accounts and purposefully hiding information from him concerning his own account. (Bates UBS-00001036-55)

125. Attached hereto as Exhibit “122” is a true copy of an October 8, 2021 email exchange between UBS employees concerning Aaron Katzel’s UBS account. (Bates UBS-00001119).

126. Attached hereto as Exhibit “123” is a true copy of the AIG Long Term Incentive Compensation Plan for awards issued 2017 or later. (Marked as CX Exhibit 118 during a prior OSHA proceeding).

127. Attached hereto as Exhibit “124” is a true copy of the UBS One Source Web Portal for Katzel’s account from February 1, 2018. (Marked as CX Exhibit 117 during a prior OSHA proceeding).

128. Attached hereto as Exhibit “125” is a true copy of the UBS One Source Web Portal for Katzel’s account from June 19, 2018. (Marked as CX Exhibit 119 during a prior OSHA proceeding).

129. Attached hereto as Exhibit “126” is a true copy of vesting notices from UBS to Katzel respectively dated April 8, 2016 and January 13, 2017 advising that his long-term compensation awards had vested. (Bates UBS-001058, 63).

WHEREFORE, it is respectfully requested that this Court deny the instant motion for summary judgment, and grant any such other or further relief to the Plaintiff as the Court deems fit and proper.

Dated: New York, New York  
September 19, 2022

Respectfully Submitted,

By:  \_\_\_\_\_

Neal Brickman, Esq.

Ethan Leonard, Esq.

Jason Stewart, Esq.

The Law Offices of Neal Brickman, P.C.

420 Lexington Avenue, Suite 2811

New York, New York 10170

(212) 986-6840

neal@brickmanlaw.com

*Attorneys for Plaintiff Aaron Katzel*